

**THE CITY OF NEW YORK
LAW DEPARTMENT**

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October 18, 2024

Via ECF

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

Re: *Harris v. City of New York*
No. 20 Civ. 2011 (JPC) (SN)

Dear Judge Cronan:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, assigned to represent the Defendant in the above-referenced matter. I write to respectfully request a one-week extension of time, from November 1, 2024 to November 8, 2024 for Defendant to submit their motions in limine. Plaintiff consents to this request.

By way of background, trial is scheduled to begin in this matter on December 16, 2024. In its pre-trial order dated April 15, 2024, the Court ordered that Defendant submit: (1) a pre-trial statement; (2) voir dire questions for prospective jurors; (3) a proposed jury charge; and, (4) a proposed verdict form. See ECF No. 120. The order also specified that, “[t]he parties shall file any motions in limine by November 1, 2024, with oppositions due by November 22, 2024.” Id. On August 5, 2024, Defendants filed their pre-trial statement and proposed voir dire questions. See ECF No. 130. On August 19, 2024, Defendant filed their proposed jury charge and verdict form. See ECF Nos. 136-37.

Defendant now requests a brief, one week, extension, for their motions in limine. This extension is being requested because the Labor and Employment Division’s Trial Supervisor, who must review the aforementioned, is currently preparing for a trial in the Eastern District of New York, Hanley v. New York City Health and Hospitals Corporation, Inc., et al. (19-cv-04246 (FB) (SJB)), where jury selection is scheduled to begin on October 21, 2024. This requested extension will allow the Trial Supervisor adequate time to review and edit said documents.

Should the requested extension be granted, it would result in the following briefing schedule:

November 8, 2024: the Parties shall file their motions in limine;

November 29, 2024; the Parties shall file their Oppositions, if any.

Respectfully submitted,

/s/


René L. Macioce
Assistant Corporation Counsel

CC: EMAIL and MAIL

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1005 Jerome Avenue, Apt D53
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The request is granted. Motions in limine are due by November 8, 2024. Oppositions to motions in limine are due by November 29, 2024. The Clerk of Court is respectfully directed to close Docket Number 138.

SO ORDERED.
Date: October 18, 2024
New York, New York


JOHN P. CRONAN
United States District Judge